

Sample Bloodborne Pathogens Exposure Control Plan

This sample plan is provided only as a guide to assist in complying with 29 CFR 1910.1030. (OSHA's Bloodborne Pathogens Standard). It is not intended to supersede the requirements detailed in the standard. Employers should review the standard for particular requirements that are applicable to their specific situation. Employers will need to add information relevant to their particular facility in order to develop an effective, comprehensive exposure control plan. The reader should consult the OSHA bloodborne pathogens standard in its entirety for specific compliance requirements. Employers should note that the exposure control plan should be reviewed at least on an annual basis and updated when necessary.

NOTE: OSHA's bloodborne pathogen standard retains the term universal precautions. Standard precautions include and expand universal precautions into a standard of care designed to protect health-care personnel (HCP) and patients from pathogens that can be spread by blood or any other body fluid, excretion, or secretion. No operational difference exists in clinical dental practice when implementing universal or standard precautions, because saliva has always been considered a potentially infectious material in dental infection control.

Reference: OSHA. Model Plans and Programs for the OSHA Bloodborne Pathogens and Hazard Communications Standards. OSHA 3186-06R 2003. Available at: www.osha.gov/Publications/osh3186.pdf. Accessed September 2004.

Sample Bloodborne Pathogens Exposure Control Plan

POLICY

The **(Your facility name)** is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Determination of employee exposure
- Implementation of various methods of exposure control, including: standard precautions, engineering and work practice controls, personal protective equipment, and housekeeping practices
- Hepatitis B vaccination
- Postexposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

■ **(Name of responsible person or department)** is (are) responsible for implementation of the ECP. **(Name of responsible person or department)** will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.
Specify location where the ECP is maintained: _____

■ Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.

■ **(Name of responsible person or department)** will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. **(Name of responsible person or department)** will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number: _____.

■ **(Name of responsible person or department)** will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. Contact location/phone number: _____.

■ **(Name of responsible person or department)** will be responsible for training, documentation of training, and making the written ECP available to employees and OSHA representatives. Contact location/phone number: _____.

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which all employees have occupational exposure:

Job Title	Department/Location
Example: (use as many lines as necessary)	
(Dentists)	(Dental Clinic)
_____	_____
_____	_____

The following is a list of job classifications in which some employees at our establishment have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

Job Title	Department/Location	Task/Procedure
Example: (use as many lines as necessary)		
Housekeeper	Environmental Services	Handling Regulated Waste
_____	_____	_____
_____	_____	_____

NOTE: Part-time, temporary, contract and per diem employees are covered by the bloodborne pathogens standard. The ECP should describe how the standard will be met for these employees.

METHODS OF IMPLEMENTATION AND CONTROL

Standard Precautions

All employees will use standard precautions. All blood OPIM will be considered infectious regardless of the perceived status of the source individual.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting **(Name of responsible person or department)**. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

(Name of responsible person or department) is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

Engineering Controls and Work Practices

Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

■ *(For example: sharps containers, safety scalpels, needle recapping devices)*

Engineering Control	Inspection/Maintenance Schedule	Responsible Individual
---------------------	---------------------------------	------------------------

■		
■		
■		

This facility identifies the need for changes in engineering controls and work practices through *(Examples: Review of OSHA records, employee interviews, committee activities, etc.)*

We evaluate new procedures and new products regularly by *(Describe the process, literature reviewed, supplier info, products considered; results of the evaluation (i.e., implemented or not appropriate)*

Engineering Control	Date Evaluated	Person Evaluated	Results of the Evaluation
---------------------	----------------	------------------	---------------------------

Both non-managerial employees responsible for direct patient care and management officials are involved in this process in the following manner: *(Describe employees' involvement—e.g., meetings, pilot testing, questionnaires)*

(Name of responsible person or department) is responsible for documenting the results of the evaluations and ensuring that these recommendations are implemented.

Needles

Contaminated needles and other contaminated sharps will not be bent, recapped, removed, sheared or purposely broke. OSHA allows an exception to this if the procedure would require that the contaminated needle be recapped or removed and no alternative is feasible and the action is required by the medical procedure. If such action is required, then the recapping or removal of the needle must be done by the use of a mechanical device or a one-handed technique. At this facility recapping or removal is only permitted for the following procedures: *(list the procedures and also list the mechanical device to be used or, alternately, if a one-handed technique will be used)*

Procedure	Device or Technique
-----------	---------------------

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by *(Name of responsible person or department)*.

The types of PPE available to employees are as follows:

(For example: gloves, eye protection, masks, long sleeved gowns, etc.)

Task/Procedure	Type of PPE	Location
----------------	-------------	----------

PPE may be obtained through **(Name of responsible person or department). (Specify how employees will obtain PPE and who is responsible for ensuring that PPE is available.)**

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used PPE may be disposed of in **(List appropriate containers for storage, laundering, decontamination, or disposal.)**
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
- Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.
- Remove immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface.

The procedure for handling used PPE is as follows:

(may refer to specific procedure by operating instruction number/name and last date of review; include how and where to decontaminate face shields, eye protection, resuscitation equipment)

Work Area Restrictions

In work areas where there is a reasonable likelihood of exposure to blood OPIM, employees are not to eat, drink, apply cosmetics or lip balm, smoke, or insert contact lenses. Food and beverages are not to be kept in refrigerators, freezers, shelves, cabinets, or on countertops or bench tops where blood or OPIM are present.

Mouth pipetting/suctioning of blood or other potentially infectious materials is prohibited.

All procedures will be conducted in a manner that minimizes splashing, spraying, spattering, and generation of droplets of blood or other potentially infectious materials. Methods that will be employed at this facility to accomplish this goal are: **(list methods, such as usage of dental dams, high-volume evacuation if appropriate, etc.)**

Housekeeping

Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see the following section "Labels"), and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling sharps disposal containers is: **(may refer to specific procedure by operating instruction number/name and last date of review)**

The procedure for handling other regulated waste is: *(may refer to specific procedure operating instruction number/name and last date of review)*

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available at *(must be easily accessible and as close as feasible to the immediate area where sharps are used)*.

Bins and pails are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.

Contaminated Equipment

Equipment, which has become contaminated with blood or OPIM shall be examined prior to servicing or shipping and shall be decontaminated as necessary, unless the decontamination of the equipment is not feasible. *(Employers should list here any equipment which it is felt can not be decontaminated prior to servicing or shipping.)*

Laundry

Laundering will be performed by *(Name of responsible person or department)* at *(time and/or location)*.

The following contaminated articles will be laundered by this company:

The following laundering requirements must be met:

- handle contaminated laundry as little as possible, with minimal agitation
- place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use *(specify either red bags or bags marked with the biohazard symbol)* for this purpose.
- wear the following PPE when handling and/or sorting contaminated laundry: *(List appropriate PPE)*

Labels

The following labeling methods are used in this facility:

Equipment to be Labeled

(specimens, contaminated laundry, etc.)

Label Type (size, color)

(red bag, biohazard label)

(Name of responsible person or department) is responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify *(Name of responsible person or department)* if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

HEPATITIS B VACCINATION

(Name of responsible person or department) will provide training to employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees identified in the exposure determination section of this plan. Vaccination is encouraged unless: 1) documentation exists that the employee has previously received the series; 2) antibody testing reveals that the employee is immune; or 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept at **(List location)**.

Vaccination will be provided by **(List health-care professional/department responsible for this part of the plan)** at **(location)**.

Following the medical evaluation, a copy of the health-care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

POSTEXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, immediately contact **(Name of responsible person)** at the following number/location _____.

An immediately available confidential medical evaluation and follow-up will be conducted by **(name of licensed health-care professional or department (e.g., internal medicine))**.

Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health-care provider.
- If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status
- If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

ADMINISTRATION OF POSTEXPOSURE EVALUATION AND FOLLOW-UP

(Name of responsible person or department) ensures that health-care professional(s) responsible for employee's hepatitis B vaccination and postexposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogens standard.

(Name of responsible person or department) ensures that the health-care professional evaluating an employee after an exposure incident receives the following:

- a description of the employee's job duties relevant to the exposure incident
- route(s) of exposure
- circumstances of exposure

- if possible, results of the source individual's blood test
- relevant employee medical records, including vaccination status **(Name of responsible person or department)** provides the employee with a copy of the evaluating health-care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

(Name of responsible person or department) will review the circumstances of all exposure incidents to determine:

- engineering controls in use at the time
- work practices followed
- a description of the device being used (including type and brand)
- protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- location of the incident (dental operatory, instrument processing area, etc.)
- procedure being performed when the incident occurred
- employee's training

(Name of Responsible Person) will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log. **(NOTE: This is usually maintained by Public Health in USAF MTFs)**

If revisions to this ECP are necessary **(Responsible person or department)** will ensure that appropriate changes are made. **(Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.)**

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by **(Name of responsible person or department)**.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- a copy and explanation of the OSHA bloodborne pathogen standard
- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices, and PPE
- an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- an explanation of the basis for PPE selection
- information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- information on the postexposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at this facility
- an opportunity for interactive questions and answers with the person conducting the training session. Training materials for this facility are available at **(name location)**.

RECORDKEEPING

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at **(Location of records)**.

The training records include:

- the dates of the training sessions
- the contents or a summary of the training sessions
- the names and qualifications of persons conducting the training
- the names and job titles of all persons attending the training sessions

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to **(Name of responsible person or department)**.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

(Name of Responsible person or department) is responsible for maintenance of the required medical records. These confidential records are kept in **(List location—e.g., medical records)** for at least the duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to **(Name of responsible person or department and address)**.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by **(Name of responsible person or department)**.

Sharps Injury Log **(NOTE: This is usually maintained by Public Health in USAF MTFs)**

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

- date of the injury
- type and brand of the device involved (syringe, suture needle)
- department or work area where the incident occurred
- explanation of how the incident occurred. This log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

HEPATITIS B VACCINE DECLINATION (MANDATORY)

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Signed: (Employee Name) _____ **Date:** _____